

Dear FCC,

I work as a Master Control Operator, but I am filing this comment as an educated individual who has knowledge in television broadcasting. I currently hold a B.A. from Kings College in Wilkes-Barre, Pennsylvania in Mass Communications and Media Technology. I am not filing this on the behalf of the company that employs me, nor its management. The opinions represented here are my own and are done at my own free will.

Opponents of the softer media ownership rules are blatantly using the tactics of only a handful of station group owners as rhetoric to give a bad name to station groups that actually seek to preserve localism. Such rhetoric includes the handful of station groups that consolidate their news operations in what's known in the industry as centralcasting. For example, Sinclair Broadcast Group's ideology behind NewsCentral, which replaces large portions of the local newscasts with a national block that is actually produced in a specialized television studio in another part of the country. Most of the smaller station groups do not use these tactics because its too costly to to purchase or lease the amount of fiber that is required to streamline their operations. There is also the chance of failure in the lines.

What's fallacious behind the reasoning of the opponents is that even if the FCC abolishes the Duopoly rules entirely, station groups can still use the same form of consolidation even if they own only one network affiliate in each market they serve. An example would be NBC's "hub-spoke project," in which NBC O&O stations in multiple markets are controlled from the specialized master control hubs in New York, Los Angeles and Miami.

My point is that even with eliminating the media ownership rules, the FCC will be unable to eliminate consolidation. In fact such a thing may actually promote consolidation which actually means less jobs and of course is very harmful to localism. This is because instead of operating two or more stations in a market, the group owners would have to combine the operations of two or three stations into just one station. The only other option if nobody buys the station, is for that market to be left without a major network affiliate. Here is why...

The ability for station group owners to operate multiple stations in small to medium sized markets is much more important to the general public than the needs of a larger station group owner who wishes to operate multiple stations in a larger market, say New York or Chicago. Many of the larger station groups operate two stations under the current FCC laws that allow Duopolys.

However, there are many small markets in this country which lack broadcast network penetration. As a result, viewers who live in in these markets are forced to purchase cable or satellite if they want to receive signals from all four of the major broadcast networks. Allow me to provide an example of the current situation in just two of these smaller markets.

In the Dover Delaware market, viewers only have access to WBOC-16 CBS, and WMDT-47 ABC. However, if they want NBC, they have to rely on WPMC-CA which is not local at all. Its a satellite station which simulcasts WAVY-10 from Norfolk, VA. Viewers in that market cannot get FOX Television over the air and their only option is to subscribe to cable in order to receive a station from out of town. This costs viewers money, and greatly limits their ability to receive free over the air TV from all four networks.

On the Island of Bermuda which was just hit with a hurricane, a station group known as Bermuda Broadcasting owns and operates all three network affiliates which are, ZFB-TV ABC, ZBM-TV CBS, and VSB-TV NBC. If the island of Bermuda was placed under even the current FCC rules, people living on the island would most likely have to rely on only one channel to simulcast the shows of three separate broadcast networks rather than three. An example is KXGN-5 in Glendive MT which currently airs both NBC and CBS programming on the same channel. No other network is available to viewers in that market unless they subscribe and pay money for Cable or Satellite in order to receive network programming from out of town. Again, these broadcasts will not be local to them.

By allowing stations to own more then one station in small to

medium sized markets, it clearly gives people the opportunity to see more from their community. In this case, they are not limited to just one or two network channels. For example, I currently work as a Master Control Operator in the Wilkes-Barre Scranton Market for a station group that operates both the CBS and NBC stations there. If WYOU-22 CBS was taken off the air, viewers would be forced to rely on broadcasts from KYW-3 in Philadelphia, or WCBS-2 in New York to receive programming from CBS. The only way they will be able to get these broadcasts is to purchase cable or satellite packages. They will not be able to receive it for free anymore.

Its great to have access to both of these stations if you are living near the edge of the TV Market like say in Pike County and commute to New York everyday, but if you cannot get WYOU anymore, you no longer have access to your local news if you are one who commutes to Wilkes-Barre. The only other option, if they want to keep CBS is to use WBRE-28 to send out both NBC and CBS programing on their analog channel or to use one of the digital side channels which can only be received by viewers with HDTVs or special converter boxes which also cost money. Even using a side channel, viewers will not likely have access to their local news. The majority of station owners who operate WB or UPN affiliates on their side channels either choose not to, or are financially unable to provide local newscasts on those channels. This also means less jobs and less local news and information for viewers living in my market unless another broadcaster comes to my area and launches a whole new station to supply CBS programming from scratch.

Relying on the false hope that large companies are willing to spend the extra money to start a new CBS operation in my market may or may not come to materialize. Just look at the Dover, DE example in the above. Its been over 50 years and Dover still does not have access to local NBC or FOX programming over the air in that market. Their only choice for local news or information is from the local CBS and ABC stations which are both owned by separate station groups. If one of those two groups were easily allowed to start up an NBC or FOX operation without having to worry about all of the red tape, then the viewers will have more choice for local news.

In the case of smaller to medium sized markets, the FCC should preserve

its Duopoly rules, and to relax the amount of red tape that station owners have to go through in markets where viewers would not otherwise have access to programming from all four networks.